| 1 | RAMZY P. LADAH, ESQ. Nevada Bar No. 11405 | | | | |
|--|---|---|--|--|--|
| $\begin{bmatrix} 2 \\ 3 \end{bmatrix}$ | ADRIAN KARIMI, ESQ. Nevada Bar No. 13514 LADAH LAW FIRM | | | | |
| 4 | 517 S. Third Street Las Vegas, NV 89101 | | | | |
| 5 | litigation@ladahlaw.com T: 702.252.0055 | | | | |
| 6 | F: 702.248.0055 Attorneys for Plaintiff | | | | |
| 7 | UNITED STATES DISTRICT COURT | | | | |
| 8 | DISTRICT OF NEVADA | | | | |
| 9 | VERNICE CHARLES, | | | | |
| 10 | Plaintiff, | CASE NO.: 2:21-CV-01712-JCM-NJK | | | |
| 11 | VS. | STIPULATION AND ORDER TO | | | |
| 12 | ISDEL RUIZ SURI; EAN HOLDINGS LLC; | EXTEND DUE DATE FOR PLAINTIFF'S RESPONSE TO DEFENDANT ISDEL | | | |
| 13 14 | ENTERPRISE LEASING COMPANY WEST LLC; DOES I through XX, inclusive; and ROE BUSINESS ENTITIES I through XX, inclusive, | RUIZ SURI'S MOTION TO DISMISS | | | |
| 15 | Defendants. | | | | |
| 16 | ALLSTATE INSURANCE COMPANY | | | | |
| 17 | _ | | | | |
| 18 | Intervenor EMPIRE FIRE AND MARINE INSURANCE COMPANY, | | | | |
| 19 | Intervenor. | | | | |
| 20 | Plaintiff VERNICE CHARLES and Defe | endant ISDEL RUIZ SURI, by and through thei | | | |
| 21 22 | respective, undersigned counsel of record, hereby stipulate to a two-week extension of time for | | | | |
| 23 | Plaintiff to respond to Defendant Ruiz' Motion To | o Dismiss, on file herein. (ECF Nos. 64 & 66). | | | |
| 24 | REASONS FOR REQUESTED EXTENSION | | | | |
| 25 | Defendant Suri filed his Motion To Dismiss and Errata to Motion to Dismiss (ECF Nos. (| | | | |
| 26 | & 66 on December 20,2021, and December 21, 2021, respectively, thus Plaintiff's response there | | | | |
| 27 | is currently due on or before January 3, 2022. H | | | | |
| 28 | is currently due on or before January 3, 2022. In | owever, due to the undersigned's apcoining trave | | | |

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| schedule, Plaintiff requested, and Defendant's counsel kindly agreed, to extend the deadline for |
|--|
| Plaintiff to respond to Defendant Suri's Motion to Dismiss to January 17, 2022. |
| The parties enter this stipulation in good faith, and not for reasons of delay or any other |
| untoward purpose. |

| DATED this 21 st day of December 2021. DAT | TED this 21st day of December 2021. |
|---|-------------------------------------|
|---|-------------------------------------|

| BREMER WHYTE BROWN & | |
|----------------------|--|
| O'MEARA LLP | |

/s/: Ty M. Maynarich, Esq. TY M. MAYNARICH Nevada Bar No. 14584 1160 N. Ton Center Drive, Ste. 250 Las Vegas, NV 89144 Attorneys for Defendant Isdel Ruiz Suri

/s/ Adrian Karimi, Esq. RAMZY PAUL LADAH Nevada Bar No. 11405 ADRIAN KARIMI Nevada Bar No. 13514 517 South Third Street

Las Vegas, NV 89101 Attorneys for Plaintiff

LADAH LAW FIRM

ORDER

IT IS SO ORDERED, December 22, 2021.

UNITED STATES DISTRICT JUDGE